



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We make Indiana a cleaner, healthier place to live.

Joseph E. Kernan
Governor

Lori F. Kaplan
Commissioner

January 12, 2004

100 North Senate Avenue
P.O. Box 6015
Indianapolis, Indiana 46206-6015
(317) 232-8603
(800) 451-6027
www.in.gov/idem

TO: Interested Parties / Applicant

RE: Home Products International, Inc. / 071-18419-00036

FROM: Paul Dubenetzky
Chief, Permits Branch
Office of Air Quality

Notice of Decision – Approval

Please be advised that on behalf of the Commissioner of the Department of Environmental Management, I have issued a decision regarding the enclosed matter. Pursuant to 326 IAC 2, this approval was effective immediately upon submittal of the application.

If you wish to challenge this decision, IC 4-21.5-3-7 requires that you file a petition for administrative review. This petition may include a request for stay of effectiveness and must be submitted to the Office of Environmental Adjudication, 100 North Senate Avenue, Government Center North, Room 1049, Indianapolis, IN 46204, **within eighteen (18) calendar days from the mailing of this notice**. The filing of a petition for administrative review is complete on the earliest of the following dates that apply to the filing:

- (1) the date the document is delivered to the Office of Environmental Adjudication (OEA);
- (2) the date of the postmark on the envelope containing the document, if the document is mailed to OEA by U.S. mail; or
- (3) The date on which the document is deposited with a private carrier, as shown by receipt issued by the carrier, if the document is sent to the OEA by private carrier.

The petition must include facts demonstrating that you are either the applicant, a person aggrieved or adversely affected by the decision or otherwise entitled to review by law. Please identify the permit, decision, or other order for which you seek review by permit number, name of the applicant, location, date of this notice and all of the following:

- (1) the name and address of the person making the request;
- (2) the interest of the person making the request;
- (3) identification of any persons represented by the person making the request;
- (4) the reasons, with particularity, for the request;
- (5) the issues, with particularity, proposed for considerations at any hearing; and
- (6) identification of the terms and conditions which, in the judgment of the person making the request, would be appropriate in the case in question to satisfy the requirements of the law governing documents of the type issued by the Commissioner.

If you have technical questions regarding the enclosed documents, please contact the Office of Air Quality, Permits Branch at (317) 233-0178. Callers from within Indiana may call toll-free at 1-800-451-6027, ext. 3-0178.

Enclosures
FNPER-AM.dot 9/16/03

January 12, 2004

Mr. Dale Seifker
Home Products International, Inc.
885 N. Chestnut Street
Seymour, Indiana 47274-1246

Re: 071-18419
First Administrative Amendment to
Part 70 071-5476-00036

Dear Mr. Seifker:

Home Products International, Inc. was issued a Part 70 permit on February 19, 1999 for an ironing board manufacturing plant. A letter requesting to add a powder coating booth was received on November 21, 2003. The booth will have a PTE of 3.22 tons of PM/PM10 per year, which is an exempted unit. Therefore, this booth will be incorporated into the Part 70 permit as a "revision to descriptive information where the revision will not trigger a new applicable requirement" under an administrative amendment. Pursuant to the provisions of 2-7-11 the permit is hereby administratively amended as follows (additions are **bolded** and deletions are ~~struck-through~~ for emphasis):

- (a) One (1) Electrostatic Powder Coating Booth, with a capacity of 6,500 pounds of product per hour, utilizing 42 pounds of coating per hour.

Sections A.2 and D.3 will be amended to incorporate the new powder coating booth as follows:

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)]
[326 IAC 2-7-5(15)]

This stationary source consists of the following emission units and pollution control devices:

East Plant:

(1) through (4) no change

West Plant

(1)(a)(b) and (2)(a)(b) no change

- (3) **One (1) Electrostatic Powder Coating Booth, with a capacity of 6,500 pounds of product per hour, utilizing 42 pounds of coating per hour.**

SECTION D.3

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]

East Plant

- (1) one (1) electrostatic powder coating operation, with a process weight rate of 5100 lb/hr.
- (2) one (1) 14.3 MMBtu/hr natural gas fired iron phosphate cleaning system.
- (3) one (1) 0.8 MMBtu/hr natural gas fired burn-off oven.
- (4) one (1) 2.0 MMBtu/hr natural gas fired curing oven.
- (5) one (1) 3.0 MMBtu/hr natural gas fired drying oven.

West Plant

- (3) **One (1) Electrostatic Powder Coating Booth, with a capacity of 6,500 pounds of product per hour, utilizing 42 pounds of coating per hour.**

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.3.1 Particulate Matter (PM) [326 IAC 6-3-2(c)]

- (a) The PM **emissions** from the **East Plant** powder coating operations shall not exceed the pound per hour emission rate established as E in the following formula:

Interpolation and extrapolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour; and} \\ P = \text{process weight rate in tons per hour}$$

For a process weight rate of 2.55 tons per hour, this equation provides an emission limit of 7.68 pounds per hour.

- (b) **The particulate emissions from the West Plant powder coating booth shall not exceed 9.07 pounds per hour at a process weight rate of 3.27 tons per hour . This limit shall be determined using the following equation:**

Interpolation and extrapolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour; and} \\ P = \text{process weight rate in tons per hour}$$

D.3.2 through D.3.4 no change

All other conditions of the permit shall remain unchanged and in effect. Please attach a copy of this amendment and the following revised permit pages to the front of the original permit.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter, please contact Aida De Guzman, at (800) 451-6027, press 0 and ask for extension (3-4972), or dial (317) 233-4972.

Sincerely,

Original signed by Paul Dubenetzky
Paul Dubenetzky, Chief
Permits Branch
Office of Air Quality

Attachments

APD

cc: File - Jackson County
U.S. EPA, Region V
Jackson County Health Department
Air Compliance Section Inspector - Vaughn Ison
Compliance Data Section - Lynetta Brown-Glover
Administrative and Development

PART 70 OPERATING PERMIT OFFICE OF AIR QUALITY

**Home Products International, Inc.
201 Jackson Street (East Plant), Plant ID 071-00001
104 West 9th Street (West Plant), Plant ID 071-00003
400 South Airport Road (Distribution Center), Plant ID 071-00026
Seymour, Indiana 47274**

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 and 326 IAC 2-1-3.2 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: T071-5478-00036	
Issued by: Janet G. McCabe, Assistant Commissioner Office of Air Management	Issuance Date: February 19, 1999

First Minor Permit Modification No.: 071-14031-00036, issued on May 1, 2001
Reopening No.: 071-13325, issued on January 25, 2002

First Administrative Amendment No.:071-18419	Pages Amended: 5, 30 Pages Added: 30a
Issued by:Original signed by Paul Dubenetzky Paul Dubenetzky, Branch Chief Office of Air Quality	Issuance Date: January 12, 2004

West Plant:

- (1) One (1) paint line consisting of:
 - (a) One (1) surface coating booth, identified as WPB1, equipped with electrostatic disc spray equipment, with a maximum capacity of seven hundred fifty (750) units per hour, using dry filters for particulate matter control, exhausting to one (1) stack, identified as S-12. (Constructed in 1969)
 - (b) One (1) surface coating booth, identified as WPB2, equipped with electrostatic disc spray equipment, with a maximum capacity of seven hundred fifty (750) units per hour, using dry filters for particulate matter control, exhausting to one (1) stack, identified as S-14. (Constructed in 1969)
- (2) One (1) paint line consisting of:
 - (a) One (1) surface coating booth, identified as WPB3, equipped with electrostatic disc spray equipment, with a maximum capacity of seven hundred fifty (750) units per hour, using dry filters for particulate matter control, exhausting to one (1) stack, identified as S-19A. (Constructed in 1969)
 - (b) One (1) surface coating booth, identified as WPB4, equipped with electrostatic disc spray equipment, with a maximum capacity of seven hundred fifty (750) units per hour, using dry filters for particulate matter control, exhausting to one (1) stack, identified as S-19B. (Constructed in 1969)
- (3) One (1) Electrostatic Powder Coating Booth, with a capacity of 6,500 pounds of product per hour, utilizing 42 pounds of coating per hour.

A.3 Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

This stationary source also includes the following insignificant activities, as defined in 326 IAC 2-7-1(21):

- (1) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour.
 - (a) One (1) 5 million Btu per hour natural gas fired boiler, identified as EBA. (Constructed in 1989)
 - (b) One (1) 0.23 million Btu per hour natural gas fired boiler, identified as WBA. (Constructed in 1991)
 - (c) One (1) 2.2 million Btu per hour natural gas fired boiler, identified as WBB. (Constructed in 1991)
 - (d) One (1) 3.2 million Btu per hour natural gas fired boiler, identified as WBC. (Constructed in 1984)
 - (e) One (1) 0.8 MMBtu/hr natural gas fired burn-off oven.
 - (f) One (1) 2.0 MMBtu/hr natural gas fired curing oven.
 - (g) One (1) 3.0 MMBtu/hr natural gas fired drying oven.

A.4 Part 70 Permit Applicability [326 IAC 2-7-2]

This stationary source is required to have a Part 70 permit by 326 IAC 2-7-2 (Applicability) because:

- (a) It is a major source, as defined in 326 IAC 2-7-1(22);
- (b) It is a source in a source category designated by the United States Environmental Protection Agency (U.S. EPA) under 40 CFR 70.3 (Part 70 - Applicability).

SECTION D.3

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]

East Plant

- (1) one (1) electrostatic powder coating operation, with a process weight rate of 5100 lb/hr.
- (2) one (1) 14.3 MMBtu/hr natural gas fired iron phosphate cleaning system.
- (3) one (1) 0.8 MMBtu/hr natural gas fired burn-off oven.
- (4) one (1) 2.0 MMBtu/hr natural gas fired curing oven.
- (5) one (1) 3.0 MMBtu/hr natural gas fired drying oven.

West Plant

- (3) One (1) Electrostatic Powder Coating Booth, with a capacity of 6,500 pounds of product per hour, utilizing 42 pounds of coating per hour.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.3.1 Particulate Matter (PM) [326 IAC 6-3-2(c)]

- (a) The PM emissions from the East Plant powder coating operations shall not exceed the pound per hour emission rate established as E in the following formula:

Interpolation and extrapolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour; and} \\ P = \text{process weight rate in tons per hour}$$

For a process weight rate of 2.55 tons per hour, this equation provides an emission limit of 7.68 pounds per hour.

- (b) The particulate emissions from the West Plant powder coating booth shall not exceed 9.07 pounds per hour at a process weight rate of 3.27 tons per hour. This limit shall be determined using the following equation:

Interpolation and extrapolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour; and} \\ P = \text{process weight rate in tons per hour}$$

D.3.2 Incinerators [326 IAC 4-2-2]

Pursuant to 326 IAC 4-2-2, the burn-off oven shall:

- (1) consist of primary and secondary chambers or the equivalent;

- (2) be equipped with a primary burner;
- (3) comply with 326 IAC 5-1 and 326 IAC 2;
- (4) be maintained properly as specified by the manufacturer;
- (5) be operated according to the manufacturer's recommendations;
- (6) comply with other state and/or local rules or ordinances regarding installation and operation of incinerators;
- (7) be operated so that emissions of hazardous material or noxious odors are prevented;
- (8) not emit particulate matter in excess of five-tenths (0.5) pounds of particulate matter per one thousand (1,000) pounds of dry exhaust gas at standard conditions corrected to fifty percent (50%) excess air; and
- (9) not create a nuisance or a fire hazard.

Source Name: Home Products International, Inc.
Source Location: 201 South Jackson Park Drive, Seymour, Indiana 47274
County: Jackson
SIC Code: 3499
Operation Permit No.: T 071-5478-00036
Operation Permit Issuance Date: February 19, 1999
Administrative Amendment No.: 071-18419
Permit Reviewer: Aida De Guzman

Home Products International, Inc., an ironing board manufacturer, proposes to install one (1) Electrostatic Powder Coating Booth in their west plant with a capacity of 6,500 pounds of product per hour (hr).

Emission calculations:

Electrostatic Powder Coating Booth - No VOC and HAP are emitted from this operation, since it is using 100% titanium dioxide. There are no AP-42 emission factor available for powder coating operation. The emission calculations method used in Minor Source Modification 071-13876, issued on April 10, 2001 will be utilized in this amendment.

$$\begin{array}{rclclcl}
 42 \text{ lbs coating/hr} & * & 7\% \text{ overspray} & * & 25\% \text{ of PM} & = & 0.735 \text{ lbs/hr} \\
 0.735 \text{ lbs/hr} & * & 8760 \text{ hrs/yr} & * & \text{ton/2000 lbs} & = & 3.22 \text{ tons/year PM/PM10}
 \end{array}$$

Rule Applicability:

$$\begin{array}{rcl}
 \text{Process weight rate} & = & 6,500 \text{ lbs/hr} + 42 \text{ lbs/hr} \\
 & = & 6,542 \text{ lbs/hr} * \text{ton/2000 lbs} \\
 & = & 3.27 \text{ tons/hr}
 \end{array}$$

326 IAC 6-3 (Particulate Emission Limitations) - For process weight rate up to 60,000 lbs/hr shall be accomplished using the following equation:

$$\begin{array}{rcl}
 E & = & 4.10 P^{0.67} \\
 & = & 4.10 (3.27)^{0.67} \\
 & = & 9.07 \text{ lbs/hr (in compliance)} \\
 & = & 39.7 \text{ tons/yr}
 \end{array}$$